

Kristen Brown, Mayor

December 19, 2014

Environmental Management Support, Inc. Attn: Mrs. Edie Findeis Cromwell 8601 Georgia Avenue, Suite 500 Silver Spring, MD 20910

Dear Mrs. Cromwell:

On behalf of the City of Columbus, Indiana, I am pleased to submit this application to the U.S. EPA for a Brownfield Assessment Grant for hazardous substances (\$200K) and petroleum (\$200K) for a total of \$400,000. The City of Columbus is located in south-central Indiana approximately 45 miles south of Indianapolis in Bartholomew County on Interstate 65.

The City of Columbus needs this EPA grant funding to combat the impacts potentially hazardous brownfields that have scarred the urban landscape; threaten the health of our residents; are a drag on local fiscal resources; impede growth opportunities of the local economy; and have damaged the natural resources of our community. A preliminary inventory has been developed and over 30 brownfield properties have been identified. Up to an estimated 60 sites may be added once the grant funding is awarded. Of these sites, the City has identified seven priority sites that disproportionately impact older, central-city neighborhoods and the socio-economically challenged populations of the City. Social justice demands nothing less than a concerted effort to assess these brownfield sites and incentivize their redevelopment.

High unemployment, a decline in decent-paying jobs, and high systemic poverty have strained the economic welfare of the City's targeted central-city neighborhoods. This economic decline has not only left residents without competitive wages but also with potentially contaminated, vacant properties. These abandoned properties depress surrounding property values, attract criminal or other unsavory activities, and pose public health and safety threats to nearby residents.

Unfortunately, the City of Columbus has suffered decades of decline in its central-city neighborhoods. While the overall economy has been relatively robust and modern greenfield industrial park development has prospered, the central city neighborhoods and early 20^{th} century industrial sites exhibit uncharacteristic decay and disinvestment. Recently, Columbus has acknowledged this phenomenon and has begun to systematically address these concerns. In response, the City's brownfield program has become a key component in redevelopment. The City has teamed with the Indiana Brownfields Program (IBP) for several projects, many of which have been or will soon be completed. We have also leveraged local and private funding to redevelop properties. Our priorities for this EPA grant will be to update and improve our

brownfield inventories/site prioritization and to continue assessments and cleanup plans for the high priority sites.

As requested, please find the following information regarding this grant application:

- a. Application Identification: City of Columbus, 123 Washington Street, Columbus, IN 47201
- b. DUNS Number: 072068257
- c. Funding Requested:
 - i) Grant Type: Assessment
 - ii) Federal Funds Requested: \$400,000
 - iii) Contamination: Hazardous Substances (\$200,000) & Petroleum (\$200,000)
 - iv) Community-wide Assessment
- d. Location: City of Columbus, Bartholomew County, IN
- e. Site Specific Proposals: Not applicable.
- f. Contacts:
 - Project Director: Carl E. Malysz, Community Development Director, City of Columbus, Phone 812-376-2520, Fax: 812-376-2565, email: cmalysz@columbus.in.gov, Mailing address: City Hall 123 Washington Street, Columbus, Indiana 47201
 - ii) Chief Executive/Highest Ranking Elected Official: Mayor Kristen S. Brown, City of Columbus, IN, Phone 812-376-2500, Fax: 812-376-2564, email: mayor@columbus.in.gov, Mailing address: City Hall 123 Washington Street, Columbus, Indiana 47201
- g. Date Submitted: December 19, 2014
- h. Project Period: Project period will not exceed three years from date of award.
- i. Population:
 - i) 44,061 (2010 U.S. Census)
 - ii) 45,775 (2013 Estimate, American FactFinder)
- i. The Other Factors Checklist is included as an attachment to this cover letter.

The City of Columbus hopes to become a model and leader in Indiana in the area of brownfields redevelopment. Thanks to our partnership with the EPA, the Indiana Brownfields Program, and many of our citizens, we are making progress toward addressing and resolving our long-standing brownfield issues. This grant is essential to successfully redevelop brownfield properties in our community. We look forward to accelerating our extensive program of community engagement with the assistance of the U.S. EPA.

Thank you for your consideration.

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Sincerely,

Kristen S. Brown

Mayor

V.B. Ranking Criteria for Assessment Grants

V.B.1. Community Need

V.B.1.a. Targeted Community and Brownfields

V.B.1.a.i. Target Community Description: The City of Columbus (the City), founded in 1821, is the county seat of Bartholomew county located in south central Indiana 45 miles south of Indianapolis. Columbus is located within Bartholomew County and has a population of 45,775 inhabitants and covers 27.9 square miles (U.S. Census 2008-2012 American Community Survey {ACS} 5-yr est.). The City is transected by important water bodies such as the White River, Flat Rock River, Haw Creek, and Clifty Creek which critical recreational and ecological role in the community. Columbus has a competitive advantage of being centrally located in the Midwest and dose to Interstate 65 with quick access to Indianapolis, Chicago, Louisville, and Cincinnati. Some residents commute to Indianapolis for work, but most work in the industrial and commercial businesses within Columbus. The City has a rich history of manufacturing dating back to the early 1900's which was once anchored by large employers such as Cummins and Arvin (auto sector manufacturing). With the closure of Arvin and the globalization of the economy over the past decades, many of the manufacturing jobs have been lost. The hub of the City's economy is the automobile industry. Because of this, 33.2% of the population works in the manufacturing industry compared to 18.4% in Indiana and 10.6% nationally. Columbus relies very heavily on this industrial sector.

The brownfields targeted for this grant are commercial and/or industrial properties located in the downtown area (Census Tract 101) and the State Street corridor (Census Tract 108) of Columbus. Many are located in primarily residential and/or mixed use areas and impact large portions of the community within which they are located, threatening both the physical and financial wellbeing of the community. The target communities serve as the City's economic engine, and offers the greatest opportunity for successful redevelopment. Many of the target sites are in areas of low income and depressed residential properties whose economic plight is only exacerbated by nearby brownfields.

Like so many other Midwestern cities founded during the 19th century, the City was originally platted before zoning and other regulations that controlled land use existed. Because of this, industry, business and housing developed side by side. Much of this development and the buildings that survive are located in the original plat is located in downtown Columbus. Here, industry, commerce, and residential properties coexist. Originally intended to facilitate the culture of living and working in the same neighborhood, this development style has resulted in former industrial centers located in residential areas, leaving scars of blight across the landscape.

In 1949, the City of Columbus and its eastern, sister city, East Columbus, were merged through annexation via the City of Columbus. East Columbus was created pre-World War II and was primarily a two-mile long business and industry strip with modest single-family tract housing developed along of State Street. Although redevelopment has been very limited in this area since the annexation, a plan has been developed to stimulate investment in the State Street corridor. With governmental support through redevelopment incentives and investment, the private sector capital this community has waited nearly 70 years to cultivate will be triggered.

The Advance Columbus Strategic Plan details the redevelopment needs specific to the target communities including the following: infill vacant lots now paved for parking with retail and mixed use development, create a more walkable downtown, create bike and pedestrian paths and infrastructure, develop more affordable housing, and diversify the State Street Corridor economy. Many of the businesses in the target communities are in residential areas; however, because of the blight and environmental damages of area brownfields, residences often remain unoccupied. Revitalizing these neighborhoods will create affordable housing within existing communities where necessary shopping, services and employment are readily available. Brownfield redevelopment will serve as the catalyst to this revitalization.

V.B.1.a.ii. Demographic Information: The impact of brownfields on the target area economy is evident by the overall economic welfare of its residents. Table 1 outlines the demographic information about the City and the sensitive populations (, children, minorities, women of child bearing age, low income) in the target community.

Table 1 – Demographics and Financial Profile

	Census Tract 101 (Downtown)	Census Tract 108 (State Street)	City of Columbus	Indiana	National
Population	4,440 ¹	3,755 ¹	44,306 ¹	6,485,530 ¹	309,138,711 ¹
Unemployment	6.8% ¹	8.7% ¹	$3.9\%^{2}$	5.3% ²	5.5%2
Poverty Rate	18.9%1	32.4% ¹	11.8%	14.7%1	14.9%1
Children Below Poverty Level	20.0% ¹	52.4% ¹	19.1%¹	20.9%¹	20.8%1

Median Household Income (MHI)	\$36,581 ³	\$36,968 ³	\$52,559 ¹	\$48,374 ¹	\$53,046 ¹
Per Capita Income	\$20,196 ³	\$17,783 ¹	\$28,4411	\$24,558 ¹	\$28,051 ¹
Percent Minority	18.2%3	22.4%³	13.3% ¹	15.2% ¹	25.8% ¹
Women of Child Bearing Age	60.0%1	58.4%1	51.4%	53.5%¹	54.3%¹

¹2008-2012 US Census ACS 5-Yr Estimates (www.census.gov)

²Indiana Department of Workforce Development (IDWD)

As indicated above, the target communities (downtown-Census Tracts 101 & State Street Corridor-108) have a disproportionate number of sensitive populations in them. The percentage of children below the poverty level is much higher than that of state and national figures. According to the U.S. Census 2008-2012 ACS, ½ of children in downtown and over ½ of children in the State Street Corridor fall below the poverty level. The unemployment, poverty rate, and income for these areas are significantly worse than Columbus as a whole, the state, and the nation. The target communities fall below Columbus, the state and the nation for unemployment, poverty (over twice the National average and nearly three times the City of Columbus figures), MHI, per capita income, and child poverty rate. The percentage of children as well as women of child bearing age is also higher than the state and national figures. According to U.S. Census data, the economic condition of the target communities has steadily declined. The poverty rate has increased 8% in the downtown and an overwhelming 119% in the State Street Corridor since 2000. The unemployment rate increases since 2000 are also alarming: 4.2%/6.8% in downtown and 3.7%/8.7% in the State Street Corridor. These crippling figures indicae that those who do have jobs are now working for much less.

These statistics are exacerbated by job losses over the past several years. The Columbus economy relies heavily on manufacturing. The City has lost nearly 750 jobs in recent years to manufacturing facility closures such as Columbus Components, Rock-Tenn, and Baldor, some of which were located in target communities and employed many of these areas residents. Significant job losses have further strained municipal funds already depleted due to loss of property and income tax revenues. Unemployment in the target community is higher than the state and national average according to the most recent data available as shown in Table 1. Brownfields in residential areas decrease property values of homes, often resulting in a lack of neighborhood upkeep and financially secure residents moving out of the neighborhoods. All of these issues add to the economic distress of Columbus's residents. Low income residents find it more difficult to move away from the shadow of brownfield properties that may be impacting their health and are often unable to obtain adequate health care.

The loss of manufacturing employment has created a "trickle down" effect, resulting in the corresponding loss of smaller, support businesses in the City, many in the last five years. In turn, the closure of other businesses (restaurants, gas stations, retail, etc.) as population growth has reversed. EPA Assessment Grant funding will bring new jobs and stimulate the growth and prosperity that is so desperately needed in the target communities and by and their residents.

V.B.1.a.iii. Brownfields: After seeking input from the local community and stakeholders, Columbus has developed an initial brownfield inventory with over 30 sites identified, and an additional 20-30 potential brownfield properties to be identified once grant funding has been awarded. These sites include gas stations, auto service garages, machine/repair shops, dry cleaners, and manufacturing facilities ranging in size from 0.25 to 22 acres. Table 2 below identifies several priority properties.

Table 2 - Priority Brownfield Sites

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Brownfield Site	Location	Suspected Contaminants*	Sensitive Populations/ Ecological Features	Redevelopment Potential
Former Golden Castings (Census Tract 101)	1313 10 th St. Downtown	Petroleum, asbestos, VOCs, SVOCs, metals, PCBs	Low income, minorities, children, women of child bearing age, health care facility, Haw Creek	Residential development
Former Sears Auto Center (Census Tract 101)	Brown & Lindsay St Downtown	Petroleum, VOCs, SVOCs, glycols, metals, PCBs, asbestos	Low income, minorities, children, women of child bearing age, White River, Flat Rock River, City park	Commercial, or mixed use (commercial/residential) development
Bob's Car Wash (Census Tract 101)	711 2 rd Downtown	Petroleum, asbestos, VOCs, SVOCs, glycols, metals, PCBs	Low income, minorities, children, women of child bearing age, White River,	Light industrial or recreational development
Parking Lot (Census Tract 101)	Washington, between 6 th & 7th <i>Downtown</i>	Petroleum, VOCs, SVOCs, glycols, metals	Low income, minorities, children, women of child bearing age, White River	Commercial or mixed use (commercial/residential) development
Vacant Commercial Building (Census Tract 108)	2121 State St. State St. Corridor	Petroleum, asbestos, VOCs, SVOCs, glycols, metals, PCBs	Low income, minorities, children, women of child bearing age	Commercial or mixed use (commercial/residential) development

Company (Census Tract 108)	State St. Corridor	VOCs, SVOCs, glycols, metals, PCBs	Low income, minorities, children, women of child bearing age	Commercial or light inclustrial
(Census Tract 108)	State St. Corridor	Petroleum, asbestos, VOCs, SVOCs, metals, PCBs	Low income, minorities, children, women of child bearing age	Residential, commercial offices, city park/greenway trailhead

*Health threats from these contaminants include: damage to the skin, liver, kidneys, heart, spleen, nervous system, respiratory system, hormonal system, blood, and immune system, and may also cause neurological damage, birth defects and cancer

Brownfields increase crime, blight, property decline, poor health conditions, and losses in tax revenues. An Agency for Toxic Substances & Disease Registry study (Journal of Environmental Health, July/August 2013) suggests that brownfield redevelopment can reduce crime by 50%. The City estimates that 50% of the target communities' properties are blighted and in decline. Without addressing the environmental impediments to these properties, redevelopment of them is very unlikely, and the burdens they place on the residents will remain.

V.B.1.a.iv. Cumulative Environmental Issues: In addition to the priority sites, many other brownfields and active inclustries add to the threats faced by the surrounding residents and ecology. In fact, there are 814 properties in Bartholomew County, 670 of which are in Columbus that have environmental records available on the IDEM's Virtual File Cabinet. Heavy industry is located throughout the City and directly impacts the air, water, and soil quality of Columbus residents.

In Bartholomew County, several other environmental issues contributing to the negative health impacts of Columbus residents including a power plant, four landfills, heavy industry, and 2 National Priority List (NPL) sites. Columbus is adjoined by I-65 to the west and is bisected by U.S. HW 31. Both of these major highways stretch from the upper Midwest to southern Alabama. At all times, they are heavily traveled by 18-wheelers transporting products from the south to the Midwest and vice-versa. According to the 2010 EPA Near-Roadway Research, "Studies have shown that people who live, work, or attend school near major roads have an increased incidence and severity of health problems that may be related to air pollution from roadway traffic." The assemblage of industrial and urban development and environmentally impacted properties creates social and economic challenges on its own, but coupled with the high density of brownfields in Columbus, the magnitude of their impact is crushing on target community residents. Redevelopment of properties near these brownfields is difficult and some viable sites are not even considered because of their proximity to brownfields.

V.B.1.b. Impacts on Targeted Community: The downtown and State Street Corridor have a disproportionately high number of children, women of child bearing age, minorities, and low income residents (including children below the poverty level) compared to state and national figures. The cumulative environmental impacts of brownfield properties/operations and their proximity to these sensitive populations and the target community result in a disproportionate exposure to environmental pollutants. Unhealthy conditions brought by contaminated brownfields coupled with the commercial and industrial impacts affecting the residents in Columbus prevent the City's sensitive populations from improving their wellbeing by adding unnecessary and often insurmountable pressure on their health and economic conditions.

The chlorinated solvents, petroleum, PAH's, asbestos, and other contaminants known and perceived to be present at the priority sites is extensive, and many are known to cause health problems, including damage to the skin, liver, kidneys, heart, spleen, nervous system, respiratory system, hormonal system, blood, and immune system, and may also cause neurological damage, birth defects and cancer. While the precise relationship between Columbus's brownfields and the health effects discussed below has not been determined, it is imperative that data be collected to determine if brownfields have contributed to the cumulative environmental impacts already present in the City.

The sites are located in or very close to potentially sensitive receptors including schools, health care facilities, residential areas, rivers, and city parks, and pose a significant threat to these receptors through exposure pathways such as direct contact, ingestion, and inhalation. Exposure to contaminants from brownfields and other industry in the area through groundwater, surface water, ambient air, indoor vapors, and surface soils results in significant cumulative environmental conditions, and the dense assemblage of brownfields in the target communities is of greatest potential exposure for residents. According to the Burden of Asthma in Indiana, 2nd Edition (2011), Bartholomew County ranks in the top 1/3 for the number of hospitalizations for asthma in the state. In addition, according to Indiana State Department of Health (ISDH) 2008 data, infant mortality is significantly higher in Bartholomew County (8.1/1,000) as compared to Indiana (6.9/1,000) as is neonatal mortality (5.0/1,000 vs. 4.4/1,000). Table 3 shows additional key data which clearly indicates the potential for impacts of brownfields on sensitive populations in the City. Health data specific to Columbus is not available; however, the statistics are believed to be representative of the City.

Table 3 – Disproportionate Health Impacts on Sensitive Populations

	Bartholomew Co.	Indiana	U.S.
Low birth weight	8.6%1	8.0%1	8.0%2
Kidney disease mortality (per 100,000)	22.71	20.6^{1}	14.6 ²
Stroke mortality (per 100,000)	51.6¹	45.2 ¹	41.42
Chronic lower respiratory disease mortality (per 100,000)	58.3 ¹	53.6 ¹	41.6 ²
Kidney disease deaths (per 100,000) ⁴	26.8 ¹	20.41	14.53
Heart disease deaths (per 100,000) ⁴	211.41	216.1	190.93
Stroke & other Cerebrovascular Diseases (per 100,000)4	57.5 ¹	47.3 ¹	42.23
Infant Mortality (per 1,000) ⁵	11.13	7.5³	6.07 ²
Adult Obesity_	31%1	30.8% ¹	27.8% ¹

Health Indicators, Indiana State Department of Health, http://www.cdc.gov/nchs/fastats/, http://www.in.gov/isdh/reports/mortality/2007/fable08/tb108.htm

Many of the priority brownfield sites are located in areas where sensitive populations are impacted. For example, according to the U.S. Census, the unemployment rate for those living in the downtown and State Street corridor areas (6.8% & 8.7% respectively) is far below that of Indiana and the U.S. (5.3% & 5.5% respectively). Moreover, 32.4% of residents living in the State Street corridor are living in poverty, and a shocking 52.4% of the children are impoverished. In many cases, the residential properties in the immediate vicinity of the sites listed in Section V.B.1.a.iii. above have high vacancy rates, very low property values, and are much older homes compared to Indiana and the nation. Census Tract 101 (downtown) has a median gross rent of \$695 compared to Indiana at \$730, and the nation at \$904. Census Tract 108 (State Street corridor) has an extremely high percent of homes built before 1950 (65.0%) compared to Indiana (36.3%) and the U.S. (18.0 %). Census Tract 101's figures are even higher at 86.6%. Older homes typically have higher utility rates and are much more likely to contain lead paint, adding to the financial and health burdens born by their residents. These statistics are indicative of how depressed the areas around the priority brownfield sites are. The residents of the target communities are already struggling with the stresses associated with their economic conditions (Table 1). Adding pressures brought by living in the midst of brownfields is often overwhelming. Other disproportionate numbers of sensitive populations such as the improverished, women of child bearing age, and minorities live, work, and play in the target areas. Exposure pathways such as groundwater, indoor vapors, direct contact with contaminated soils, surface water runoff, and migrating airborne dust make nearby and often adjoining brownfields a serious risk of contaminant migration and exposure to the already struggling residents,

According to the Consumer Health Foundation, low-income residents become sick more frequently and more quickly, and die at younger ages on average than those in more affluent communities. Children living in poverty are 7 times more likely to be in poor or fair health than children in high-income households. Exposure of Columbus's residents to contaminants aggravates their health conditions and impoverished residents are less likely to receive adequate medical care.

Due, in part to the large number of abandoned and potentially unsafe buildings associated with brownfields in the target community, criminal activity is higher in these areas creating a legitimate safety concern. For example, in recent months, the Golden foundry has been the site of a fire, a meth lab, and vagrants living in the structure.

V.B.1.c. Financial Need

V.B.1.c.i. Economic Conditions: Blighted and declining neighborhoods in the target communities, once thriving with active businesses and are now suffering from the scars of vacant commercial sites where these businesses were once located. This cyclical pattern of decline must be stopped through an aggressive injection of capital. Limited municipal resources make this impossible without EPA funding assistance. Although the City has made efforts to address brownfields, local financial resources have been strained due to declining resident prosperity, loss of commercial employers and property taxes and as a result, the City is unable to fund the needed environmental assessments. Other strains have further restricted resources to address brownfields. For example, legislation passed by the Indiana General Assembly in 2004 imposed caps on levies, and in 2011, the State Constitution imposed caps on property taxes, which greatly reduced tax receipts received by the communities. Because operational budgets including fire, police, and waste management must be met, the City budget is directing funds away from redevelopment. Without an Assessment Grant, Columbus will not be able to support the assessment of brownfields and environmentally impacted properties in the City. This makes the need to return brownfield properties to the tax rolls even more critical to increase the local tax base, providing essential services to the communities.

Households in the target communities (Census Tracts 101 and 108) contrast greatly with the rest of Columbus. Median Household Income, Per Capita Income, and Poverty Rate statistics are all worse than Indiana and national figures

(Table 1). The downtown and State Street corridor are also home to a high percentage of low income, impoverished, and women of child bearing age compared to the remainder of the City, the state, and the nation. These areas are also where the majority of Columbus's brownfields are located (Table 2). Job losses have increased the income crisis in these areas and as a result, residents are unable to improve their economic wellbeing. Columbus residents have lost 750 jobs in the past five years (IDWD). Home values remain low, rent is far lower than the county, state, and national averages, and the number of old homes is extremely high.

Because of these and other fiscal and economic challenges discussed above (low income, high poverty rate, unemployment, limited tax base, falling property tax revenues) Columbus's ability to fund the investigation and clean-up of the large number of brownfield sites is very limited. EPA approval for funding will enable the City to fully assess conditions on inventoried and prioritized sites. Moreover, it is anticipated that if awarded this grant, the City will be afforded opportunities that will lead to additional state, federal, and private investment support including EPA Clean-up Grants, Indiana Brownfield Program/EPA RLF loans, SBA loans, private sector investment such as insurance funding and redevelopment investment, etc. that would provide much needed resources for redevelopment activities.

As indicated on the Other Factors Checklist in Attachment VI, Columbus has experienced a series of natural disasters in the past several years. In June 2008, a catastrophic flood devastated Columbus causing over \$500M in damage throughout the community to residences, industry, banking institutions, and commercial properties alike. For example, Columbus Regional Hospital was closed for 6 months due to extensive damages. Census Tracts 101 and 108 were significantly impacted by the flooding further crippling the finances and health of these already struggling residents. This event triggered significant economic loss to the community from which recovery will take decades. EPA grant funding will offset some financial losses associated with the economic damage in impacted areas of the City.

Because of the fiscal and economic challenges discussed above, the City's ability to fund the investigation and clean-up of the large number of brownfield sites is very limited. EPA's approval for funding will provide Columbus the ability to fully assess conditions on inventoried and prioritized sites. Moreover, the grant will lead to additional state and federal support including EPA Clean-up Grants, Indiana Brownfield Program/EPA RLF loans, SBA loans, private funding, etc. that would provide much needed resources for redevelopment activities.

V.B.1.c.ii. Economic Effects of Brownfields: The inventoried sites carry a high impact on the property tax base. Because of the poor condition of many of these properties and the lack of quality improvements, the taxes levied on these sites are very low. The poor condition of the brownfields in the target communities limits the ability for area residential properties to appreciate and adds to the cycle of decay, preventing residents from moving away from the blight because of a lack of home equity and a lack of gainful employment near their homes, depriving them of the opportunity to improve their socioeconomic status. The lack of improvements on surrounding properties also further reduces the property tax potential these surrounding sites hold. Assessment and cleanup of brownfield properties will likely lead to opportunities for target community residents to improve their income, increase the equity they have in their homes, and will kindle redevelopment and increased property tax revenues on these properties. EPA Brownfields Assessment Grant funds are needed as the initial investment stake for brownfield properties to not only inform reluctant investors of the properties' environmental conditions, but to help them see and understand the investment potential of these properties, thereby caralyzing reinvestment in the Columbus area. Columbus must be aggressive in seeking resources to help kindle redevelopment and turn the declining local economy around. Although some success has been made, assistance through the EPA Brownfields Assessment Grant will trigger a much quicker recovery and will help the City return to prosperity. Because of the urbanization of the area and its dense population, an investment by the EPA in Columbus will have positive economic impacts to the entire region. The lack of discretionary income has severely restricted the ability of property owners to invest in upgrading or even maintaining their properties. The general conditions of the area combined with known and feared environmental issues have made bankers and other lenders unwilling to invest in the area as well.

V.B.2. Project Description and Feasibility of Success

V.B.2.a.i. Project Description: The Advance Columbus Strategic Plan outlines a vision for the target communities that reinforces these areas as the City's employment centers, removes barriers to future redevelopment, improves existing infrastructure rather than developing new, diversifies the employment base, and pursues a redevelopment that shapes the areas into places to live, work, play, and shop in a more walkable, bikeable environment. To accomplish this, the City intends to expand residential and educational opportunities to residents by improving and increasing housing options, and encouraging learning institutions (such as Indiana University-Purdue University Columbus) to locate in a planned education center, add a

grocery, a drug store, and other convenience retail, and enhance the City's walking/biking trail system and greenspace inventory. Redevelopment of the downtown and State Street corridor will make Columbus a destination for regional residents. With the initial site investigation funding in place through EPA grant funds, the often difficult first step of redevelopment will be funded and the City can put their revitalization plans into motion. For example, redevelopment of the former Golden Foundry property, a high priority target site indicated in Section V.B.1.a.iii., will remove the stigma associated with environmental contamination (site known to be contaminated with chlorinated solvents and PAH's). This site could again become a viable asset to the community. Temporary jobs would be created through construction work to improve the property and permanent jobs in property management and assisted living care will be created. An important housing need for the target community will also be met through the construction of an apartment complex and an assisted living facility that will bring \$26.6M in investment, 100 construction jobs, and over \$1M in annual payroll once the facility is operational. Documentation for these leveraging commitments is included in Appendix IV.

V.B.2.a.ii. Project Timing: Columbus will aggressively begin grant related activities immediately upon confirmation that they have been selected for funding. The City will work with the assigned EPA Project Manager to prepare application materials and will complete an EPA approved Work Plan. Once the Work Plan is approved, the City will select a qualified environmental consultant in accordance with federal procurement guidelines. Grant startup tasks will be completed according to the following timeline:

- ~ Before Notice to Proceed from EPA Environmental Consultant selected and under contract
- ~ 1st Quarter of Grant Period Quality Assurance Project Plan (QAPP) submitted to EPA for review/approval
- 1st Quarter of Grant Period Community input requested through public meeting
- ~ Early 2nd Quarter of Grant Period Brownfield Inventory updated, site prioritization and selection finalized
- Early 2nd Quarter of Grant Period Eligibility Determinations requested & site access requested
- ~ 2rd Quarter of Grant Period Phase I ESAs begin
- ~ 3rd Quarter of Grant Period QAPP approval & Phase II ESAs begin
- ~ 1st, 3rd, 5th, 7th, 9th, & 11th Quarters of Grant Period Community input requested through public meeting
- End of 11th Quarter of Grant Period All Phase I ESAs completed
- ~ 30 days before end of Grant Period All Phase II ESAs completed and final contractor invoices received.

Because delays early in projects have long term, lingering impacts on schedules through the duration of the project, the City will work diligently to assure startup activities are completed according to the schedule above. It is the City's intent to allocate all grant funds to project properties before the final quarter of the grant period to assure that grant task activities are completed before the end of the cooperative agreement contract which will be managed by Carl Malysz, Columbus Director of Economic Development (See V.B.2.c.i).

V.B.2.a.iii. Site Selection: In an effort to take a comprehensive, phased, and prioritized approach to brownfield redevelopment, the City, with the assistance and support of the public, has made an effort to identify over 15 brownfield sites. The City uses and will continue to use the inventory as a tool to help accomplish redevelopment goals. A public meeting was held on December 9, 2014 to inform and involve the community and other stakeholders of the brownfield assessment grant and the planned activities funded by it, and to gather public input on the brownfield assessment grant process. Based on the participation of the public and City representatives' input, an initial list of priority sites was developed.

The existing brownfields inventory will be expanded based on further community input and nominations. A final prioritization of identified brownfield sites will be developed based on: 1) redevelopment potential (e.g. property marketability, redevelopment potential, potential for economic benefit), 2) potential for environmental or human health impact and environmental justice, and 3) community input. Because some identified brownfield sites have been determined to be high priority such as the former Golden Castings and Sears Auto Center properties, these sites will also be a factor in prioritization of other sites. In addition, based on EPA and community input, additional criteria may be included in the prioritization process. Once prioritization is complete, the City will aggressively begin assessment activities and develop funding plans for deanup of properties, if needed, to prepare the sites for redevelopment as quickly as possible.

Columbus has begun to communicate with representatives of some privately owned priority sites to gain access or to resolve access issues in anticipation of this grant funding as well as non-grant funded environmental assessment activities (e.g. access already approved for the Golden Castings site). Such communication also initiates the process for eventual property transfer and redevelopment. These discussions are ongoing creating a positive dialog between property owners, local

government, and impacted citizens. An access agreement, which grants access to private parties for conducting environmental assessments, will be prepared and used for properties where site access is necessary to complete grant activities.

V.B.2.b.i & ii Task Description and Budget Table: As indicated in Table 4, Columbus will allocate \$353,000 of the total \$4(X),(XX) to Phase I ESAs (typically \$2,5(X)-3,5(X) each) and Phase II ESAs (typically \$25,(XX) each). This equates to 88% of the total grant funding assigned directly to environmental site assessments, maximizing the redevelopment benefit for the Gry and leverage future investment. With investigation funding in place, the Gry can begin to leverage other resources to complete the redevelopment of the priority brownfields.

			Table 4 – B	udget			
		HAZ	ARDOUS SU	BSTANCES			
Budget Categories (programmatic costs only)	Task 1 Program Management & Training Support	Task 2 Brownfields Inventory & Prioritization	Task 3 Phase I ESAs	Task 4 Phase II ESAs	Task 5 Clean-up Planning & Health Monitoring	Task 6 Community Outreach & Involvement	Budget Category Total
Personnel							
Fringe Benefits							
Travel	\$1,500						\$1,500
Equipment							
Supplies	\$250					\$250	\$500
Contractual*	\$2,000	\$5,000	\$25,000	\$151,500	\$12,000	\$2,500	\$198,000
Total (Haz)	\$3,750	\$5,000	\$25,000	\$151,500	\$12,000	\$2,750	\$200,000
		PET	ROLEUM PI	RODUCTS			
Budget Categories (programmatic costs only)	Task I Program Management & Training Support	Task 2 Brownfields Inventory & Prioritization	Task 3 Phase I ESAs	Task 4 Phase II ESAs	Task 5 Clean-up Planning & Health Monitoring	Task 6 Community Outreach & Involvement	Budget Category Total
Personnel							
Fringe Benefits							
Travel	\$1,500						\$1,500
Equipment							
Supplies	\$250	_				\$250	\$500
Contractual*	\$2,000	\$5,000	\$25,000	\$151,500	\$12,000	\$2,5(X)	\$198,000
	4		400000	A	410.000	40	

*In accordance with federal procurement guidelines (40 CFR 31.36, or for non-profits, with 40 CFR 30.40 through 30.48), the Gry will follow its rounicipal process, compliant with Inclinia Code (IC5-16-11.1 and IC36-1-12) for bidding/awarding contracts

\$25,000 | \$151,500 |

\$12,000

\$5,000

Task 1: Program Management & Training Support- \$7,5(X) - A total of \$3,(XX) (\$1,5(X) each for hazardous salestances and petroleum) in expenses is estimated for travel to regional and national meetings for peniodic training and program management assistance and will be funded by this portion of Task 1. In addition, a total of \$500 (\$250 each for hazardous substances and petroleum) in supplies for support materials needed (such as office supplies and printing related to community outreach materials) has been allocated to this portion of Tisk 1. The Gity and its consultant will need to call, meet, and correspond with US EPA stuff to manage the grant's cooperative agreement. For this, \$4,000 (\$2,000) each for hazardous substances and petroleum), or approximately 52 hours over three years at an estimated \$77/hr, has been allocated to contractival for this portion of Task 1. In addition, existing funds supporting City and consultant staff time will be used for this task per the Ability to Leverage section below.

Task 2: Brownfields Inventory & Prioritization -\$10,000 (\$5,000) each for hazardous substances and petroleum) - The City will use the funds allocated in this task to update their brownfield inventory. An initial public meeting will be held in the first six months of the grant period to gain public input on properties which may need to be added to the inventory and to help prioritize the inventorical sites. Columbus's redevelopment plans may be updated based on the findings of the revised inventory outlining priority ranking criteria, cleanup options and strategies, and end-use options for those brownfield sites. Existing funds supporting City and consultant time will be used to cover the costs associated with site eligibility determinations per the Ability to Leverage section below.

Task 3: Phase I Environmental Site Assessments (ESAs) — \$50,000 (\$25,000 each for hazardous substances and petroleum) — The City will contract Phase I Environmental Site Assessment (ESA) activities on key sites throughout the community. All Phase I ESAs will be conducted in accordance with the ASTM standard for Phase I ESAs (E1527-13) and the All Appropriate Inquiry (AAI) rule. It is estimated that the costs for completing Phase I ESAs will range from \$2,500 to \$3,500 per site depending on site complexity. The estimated outputs from Task 3 will include seven to ten Phase I ESAs on hazardous substance sites and seven to ten Phase I ESAs on petroleum sites. Areas of focus will include those already prioritized in the existing inventory (Section VB.1.a.iii.).

Task 4: QAPP/Phase II ESAs /Site Investigations/Geophysical Surveys — \$303,000 (\$151,500 each for hazardous substances and petroleum) — The City will contract for approved work plans, field activities, and reports that will be reviewed by the EPA Project Manager and the Indiana Brownfields Program or the IDEM Voluntary Remediation Program staff consistent with the IDEM Remediation Closure Guide (RCG), as appropriate. These activities may include geophysical surveys to locate buried tanks, initial Phase II ESAs, and delineation of soil and ground water contamination. It is estimated that costs for completing Phase II ESAs will range from \$25,000 to \$45,000 per investigation depending on site complexity and the environmental conditions identified in the preceding Phase I ESAs. The estimated outputs for Task 4 will include four to six Phase II ESAs on hazardous substance sites and four to six on petroleum sites.

Task 5: Clean-up Planning & Health Monitoring — \$24,000 (\$12,000 each for hazardous substances and petroleum) — The City will commit funds from this task to complete three to five Analysis of Brownfield Cleanup Alternatives and Remedial Action Plans associated with sites assessed and ready for remediation. Many contaminated sites pose a potential risk to neighbors through various exposure pathways. For sites with confirmed contamination, an assessment of the impact to human health may also be conducted for neighboring properties and/or properties nearby that are on ground water wells. If vapor intrusion is determined to be a concern, the indoor air, sub-slab, and soil gas of neighboring properties may be sampled to measure the presence of dangerous vapors. In addition, existing funds supporting local health department staff time will be used for this task per the Ability to Leverage section below.

Task 6: Community Outreach & Involvement – \$5,500 (\$2,750 each for hazardous substances and petroleum) – Involvement of key stakeholders (residents and business owners near brownfields, investors, brownfield site owners) and the general public is integral for a successful brownfield redevelopment program. Lake Station will use funds allocated in this task to facilitate community outreach and involvement. The associated costs will fund coordinating/conducting community outreach programs and meetings as well as the costs to prepare, print, and mail project and site information and marketing documents. These tasks will provide information and take input on the plans and progress of brownfield investigation and cleanup planning activities to the general public as well as marketing sites for future development. The City will hold a minimum of six public meetings throughout the grant period to update the community on the brownfield assessment progress and to seek public input and involvement.

V.B.2.c. Ability to Leverage: The City has access to many different funding sources from the local, state, and federal levels in addition to the private sector. Columbus will provide in-kind items and services such as staff time, meeting facilities, educational materials, social media updates, public notices, public meetings, and other activities. The City will also provide some in-kind staff time and resources to complete all needed programmatic management of the grant funding. This includes all ACRES submissions, quarterly reporting, grant budget tracking, and various other submissions. It is estimated that Columbus will provide approximately 200 hours of staff time at an average \$40/hr which is an estimated \$8,000 in in-kind services. The environmental consultant will also be expected to provide in-kind services valued at \$4,000 for assisting with ACRES submissions, quarterly reporting, and coordinating/implementing public meetings with stakeholders (including the general public, government representatives, chamber of commerce, redevelopment authorities, economic development authorities, etc.).

The City of Columbus has a history of leveraging investment in projects throughout the community (Table 6). For example, the City recently leveraged \$157,750 in grant funding to demolish the former Golden Castings site and remove debris from the property. In fact, over 90% of the entire project was leveraged from outside funding sources and has triggered an additional \$26.6M in private investment. In all Columbus has leveraged over millions in grant funding to improve streets, sidewalks, greenways, and other infrastructure projects over the past five years to help revitalize the community. These projects

are indicative of how Columbus is able to use non-local funds to stimulate redevelopment. Adding EPA Assessment Grant funding will add to this leveraging effort to further revitalize the community.

Firm leveraging commitments have already been obtained to add to the EPA assessment funding effort. The City has received a grant from the Indiana Office of Community and Rural Affairs for \$157,755 to demolish the remaining structure on the Former Golden Castings site. This site already has planned investment from two redevelopers to transform the property into apartments and an affordable senior housing development creating hundreds of jobs, increasing the tax base and leveraging \$23.6M for site development. Columbus has also pledged to invest TIF funding to aid in the redevelopment of brownfield sites as determined to be appropriate. Leveraging of general liability insurance funding is also expected, which generates significant funding for environmental work (See *Liability Insurance Funding* below). Additionally, the City has pledged \$400,000 in leveraged funds from the following four programs outlined below: Community Development Block Grant (CDBG), US Dept. of Agriculture (USDA) Small Business Revolving Loan Program, Tax Increment Financing (TIF), and tax abatements. Documentation indicating these leveraging resources is included in Attachment V and noted on the Other Factors Checklist.

As properties are assessed, the Columbus will work in partnership with many agencies and entities to fill in funding gaps to ensure the success of brownfield redevelopment projects in the City. A detailed funding plan will be developed for brownfield sites/areas as assessment projects develop. Each site will have a unique funding plan because of their individual status and eligibility. The Following are some of the sources of funding that will be used and/or pursued to leverage the EPA investment:

- <u>CDBG</u>: The City will leverage this funding to eliminate slums and blight including brownfields as well as infrastructure. \$50,000 in CDBG funding is pledged by the City to leverage EPA grant funds (Attachment V).
- <u>USDA</u>: Columbus operates a small business Revolving Loan Program funded through the USDA. This funding will be used as leveraging to redevelop the State Street Corridor. \$110,000 in funding is available and will be limited to \$20,000 per project site (Attachment V).
- <u>TIF:</u> Property tax revenue used as a subsidy for redevelopment, infrastructure, and other improvements. TIF funding pledged by the City of Columbus on a case by case basis (see Attachment V).
- <u>Tax Abatements</u>: Columbus routinely provide tax abatements to redevelopment projects resulting in private investment and job creation. The City pledges to utilize this funding in support of brownfield redevelopment (Attachment V)
- <u>Bartholomew Co Health Dept.</u>: Tracking aid to residents in affected brownfields areas, provide blood lead level testing in low income, disadvantaged residents, and provide educational/counseling services for residents with elevated blood lead. Leveraging investment for these services is estimated at \$7,000 over the cooperative agreement period (Attachment V).
- <u>EPA:</u> Additional EPA Assessment, Cleanup, and Revolving Loan Fund (RLF) Grants may be sought to further the brownfield redevelopment goals of the City.
- Federal Highway Administration: Funding for infrastructure improvements such as streets and pedestrian/bicycle pathways.
- Indiana Economic Development Corp. (IEDC): The IEDC offers tax credits and other incentives to help communities create a
 dimate where pressures from taxes, investment costs, and red tape are lower. The City will pursue assistance from the IEDC
 to maximize the leverage of each dollar invested in brownfields.
- <u>Indiana Brounfields Program (IBP)</u>: IBP offers low-interest/partially-forgivable loans for brownfield investigation and cleanup through the EPA-funded Revolving Loan Fund (RLF), State Revolving Fund (SRF), and other IBP-directed Section 128A funding. RLF funding will be used to remediate highest priority sites investigated through this Assessment Grant. SRF funding is available for qualifying communities through an interest rate discount on wastewater improvement project loans. The savings realized through the rate reduction can be used to remediate brownfield sites. IBP-directed funding, such as Section 128A, may be used to complete the investigation of sites identified and partially assessed in this Grant.
- Excest Liability Trust Fund (ELTF): ELTF provides up to \$2M in state insurance funding for investigating and remediating eligible sites with underground storage tanks (USTs). This funding will be used on qualified sites with petroleum contamination.
- <u>Private Funding:</u> Private funding may be used to remediate sites ineligible for state/federal funding. Such sites may need
 encouragement and redevelopment support from the City to conduct necessary clean-up prior to redevelopment. Columbus
 will use all means to encourage private funding for further investigation and remediation, as needed.
- · Liability Insurance Funding: Indiana courts have rule that historical general liability policies must cover assessment and

remediation costs on sites known to be contaminated. Using EPA Assessment Grant funding to demonstrate the presence of contamination will help trigger viable liability insurance policies to fund the cleanup of environmental damages. The Gity will make every effort to apply this funding source to all eligible sites. The funding is only limited by insurance policy dollar caps (often \$1-3M). Insurance recovery is not limited to municipally owned properties. This funding strategy has been successfully used as leveraged dollars coupled with EPA assessment funding on two brownfields in Logansport, IN, leveraging \$200,000 in assessment funds to date with an anticipated additional \$1-2M in the future assessment and cleanup funding. This success will continue with the use of EPA Brownfields Assessment Grant funds by aggressively pursuing insurance funding on all applicable properties where contamination is identified (see Attachment V).

Others: The City will also seek additional funding from the following sources: US Economic Development Administration,
and US Department of Transportation grants, and new funding opportunities and incentives that become available in the
future.

V.B.3. Community Engagement and Partnerships

V.B.3.a. Plan for Involving Targeted Community & Other Stakeholders; and Communicating Project Progress:

V.B.3.a.i. Community Involvement Plan: A minimum of six public meetings will be held to maintain stakeholder engagement and continue to gather public input on their vision for site selection, assessment needs, cleanup decisions, and redevelopment planning. Each public meeting will be advertised through various local media venues, which may include municipal and partner websites, social media, local papers, radio, etc. to ensure that the whole community has the opportunity to provide input. In addition, the City will leverage its social media platforms, earned media and other low-cost, no-cost or inkind methods to engage the community. A public meeting will be held in the first two quarters of the grant period to discuss the goals of the grant, initial planned activities, and a schedule for future community involvement events. For subsequent meetings, personal invitations will be sent to residents directly impacted by priority sites, neighborhood groups, lenders, area businesses, and developers to maximize the engagement of these stakeholders. Regional developers will be contacted to bring awareness of the redevelopment opportunities the priority sites offer. When investors for priority sites are identified, they too will be in attendance at public meetings to describe their plans for redevelopment. Translators will be available to disseminate information in Spanish to ensure all residents the opportunity to participate. The City prepared to provide other language translators as needed. As stakeholder input is provided, it will be maintained in a database to be used for reference when determining assessment and redevelopment priorities. This effort will ensure that the information provided by those directly impacted by brownfield sites in the target communities will be incorporated into the prioritization and redevelopment process. As appropriate, the City will also take advantage of visioning sessions offered by the Kansas State TAB program to maximize the incorporation of target community input.

V.B.3.a.ii. Communicating Progress: The City understands the importance of communicating the progress of EPA Assessment Grant activities. A communication plan has already been developed and already put into motion. A public meeting was held on December 9, 2014 to communicate with the public and stakeholders about the brownfield proposal, inventory, and assessment progress. The City has also passed a resolution making public their commitment and support for the grant application effort recognizing the need for aggressive brownfield redevelopment in the community which will be dramatically accelerated with this grant award (see Attachment III). Upon notification of the EPA grant award, the City will notify the public through media releases to local radio stations, newspapers websites, Facebook, Twitter, and other social media outlets. Taking advantage of multiple media technologies will allow the City to communicate with all age groups and demographics in the target communities and provide opportunities for all to be informed of the project progress.

V.B.3.b. Partnerships with Government Agencies: The City of Columbus has developed partnerships and working relationships with the following government agencies:

V.B.3.b.i. Local/State/Tribal Environmental Authority

- The Indiana Department of Environmental Management Petroleum Eligibility Determinations, site closure documentation, UST closure documentation, ELTF funding (for LUSTs), guidance & expertise. Columbus's initiatives are currently supported by IDEM in the form of a support letter included in Attachment II.
- Indiana Brownfields Program Eligibility Determinations (petroleum sites) Site Status Letters, Comfort Letters, interpreting
 Due Care requirements, grant/loan funds, guidance & expertise, and develop plans to support redevelopment including
 remediation strategies that integrate site design which will reduce costs

V.B.3.b.ii. Other Relevant Governmental Partnerships: The City will work with other relevant federal, state, and local governmental agencies including the following:

- Bartholomew County Health Department (BCHD): The City has a strong relationship with the BCHD, and will work directly with them as it relates to health monitoring. The health department's role will be to provide experience and expertise to help identify/verify health threats posed by identified brownfields contamination, perform risk evaluations, conduct notification/education programs, and coordinate health testing if migration of contamination from brownfields is confirmed. As health concerns are identified in areas near known brownfields, assessment data will be shared with the Health Department to help determine connections of site contaminants to the health of residents. BCHD will lend their expertise and experience to help identify and verify off-site health threats posed by the contaminated brownfields identified through the grant. With this information, risk evaluations will more easily be completed. The BCHD is also responsible for several programs designed to improve the environmental health and safety of Bartholomew County residents and employees, including blood lead level testing, which will be provided for the residents of the target communities as an in-kind service. Columbus will work with the BCHD to take advantage of all these areas of expertise to assist with brownfield redevelopment activities.
- EPA Hazardous substance Eligibility Determinations (hazardous substance sites), assessment grant funds, SRF funding for utility infrastructure improvements (drinking water and wastewater), Targeted Brownfield Assessments, guidance & expertise
- DOT Provide funding for infrastructure improvements such as surface transportation improvements, bike/pedestrian transportation infrastructure, safety, and accessibility.
- HUD Provide funding for community planning and development including multifamily housing and single family housing including affordable housing funding.
- Bartholomew County Soil and Water Conservation District Provide leadership in conservation and development of soil, water and related resources; help implement soil/water conservation practices in the Columbus community.
- WorkOne—Subsidiary of the Indiana Dept. of Workforce Development; specializes in developing opportunities for employers and job seekers to improve the region's workforce through job placement assistance, workshops, and training. Columbus will partner with WorkOne to place qualified candidates with companies seeking to fill positions in environmental investigation, remediation, and site redevelopment.

All redevelopment plans will be designed to reduce the risk to area residents and provide a safer community.

V.B.3.c. Partnerships with Community Organizations: Several community based organizations have pledged a supporting role for Columbus's brownfields program (Table 5).

V.B.3.c.i. Community Organization Description & Goal:

Table 5 - Community Based Organization Partners

Table 7 – Continuity Based Organization Faturers				
Organization	Description	Supporting Role Pledged		
Heritage Fund	Nonprofit community advocacy	Public outreach, input on grant process, boards and committee		
	organization_	participation		
United Way of Bartholomew	Nonprofit community improvement	Public outreach, input on grant process, brownfield inventory		
<u>Co</u>	organization	support, job training		
Lincoln Center Neighborhood	Nonprofit community advocacy	Organize neighborhood meetings, public outreach, boards and		
	organization	committee participation		
Thrive Alliance	Nonprofit community enhancement	Public outreach, brownfield inventory support, report grant		
	organization serving elderly & low income	progress to target community		
Columbus Economic	Economic development organization	Brownfield inventory support, redevelopment support, serve on		
Development Board	Decembrate developation of garlization	boards and committees.		
Columbus Area Metropolitan	Municipal planning organization	Public outreach, provide redevelopment planning expertise,		
Planning Organization	With the planting organization	facilitate public meetings, provide meeting space		
Columbus Area Chamber of	Business advocacy group	Public outreach, historic preservation support/redevelopment		
Commerce	Dusiness activocacy group	support, provide meeting space, disseminate information about		
Ivy Tech Community College	Educational institution	Provide trained workforce for redevelopment efforts, green job		
Try 1 car carmindle whose	LAIGUALLAI II BUUULAI	training for students, in-kind redevelopment design		

This assemblage of community partners is best suited to reach out to Columbus residents and the target community because of the breadth of their expertise. This group has regional influence and local ties, maximizing the benefits they bring to the project. The City will work with business organizations, government agencies, and community members to develop strategies for assessment, remedial planning, and ultimately, cleanup. Bringing all interested stakeholders together to share information creates the best foundation for successful and sustainable community-based brownfields redevelopment planning and projects.

All projects assessed with EPA funds will be entered into the Indiana Department of Environmental Management Voluntary Remediation Program (VRP) or the Indiana Brownfields Program per program guidelines.

V.B.3.c.ii. Letters of Commitment: Letters of Commitment are included as Attachment IV.

V.B.4. Project Benefits: EPA grant funding will help sustain, dean up, and restore Columbus and the ecological systems that support it by providing funds to assess brownfield sites. The City's goals and anticipated outcomes for this application are described in Section V.B.4.b.ii below. Current environmental conditions in the City area are of primary concern, including potential soil and water contamination and environmental justice issues. Efforts to monitor human health and the environment resulting from exposure to pollutants or contaminants are proceeding. To reduce environmental threats and roadblocks to redevelopment goals, targeted areas have been identified for assessment. By conducting assessments, engaging stakeholders and residents, and sharing information, Columbus will address confirmed environmental issues and refine redevelopment plans, so they can be implemented to meet anticipated outcomes. The City will seek to integrate Livability and Equitable Development Principles into reuse/redevelopment of brownfield sites and to avoid displacing residents historically affected by brownfields. The City will work with the Bartholomew County Health Department and may also contact the Agency for Toxic Substances & Disease Registry (ATSDR) for technical support and resources to support public health assessments and other studies to prevent exposures and disease related to toxic substances.

As priority sites are redeveloped, improvements in the environmental, social welfare, and public health of the neighborhoods and City will be made. Sustainable redevelopment of sites for commercial use will provide jobs, thereby reducing poverty and indirectly improving social and public health of the neighborhood and City. Redevelopment of brownfield sites will help create residential housing, thereby improving the social welfare and public health of the neighborhoods, meeting the goal of promoting equitable, affordable housing as outlined in the Livability Principles. It will also help strengthen the local economy by diversifying the economic base through the attraction of new businesses, and will enhance the health and aesthetics of the community by improving the walkability, bikeability, and park system in the city.

V.B.4.a. Health and/or Welfare and Environment

V.B.4.a.i. Health and/or Welfare Benefits: EPA grant funding will play a critical role in meeting the objectives in the completed Advance Columbus Strategic Plan. As the plans outlines, target communities' brownfields will be addressed, eliminating blighted, underutilized, and unsafe properties, returning them to active and sustainable reuse as mixed use commercial/residential sites, trail and park space, and revitalized commercial properties. This grant effort will eliminate the environment for criminal activities, blight, and decline typically found on brownfield sites, and replace it with retail and mixed use development (Parking Lot on Washington St.), trail heads and greenspace (Former State St. School), affordable housing (Former Golden Castings), and a diversified, robust, eco-friendly local economy (Vacant Commercial Building and Former Auto Company on State St) which will help sustain, clean up, and restore the City and the ecological systems that support it by providing funds to assess brownfield sites. As redevelopment progresses, blight will be eliminated and property values will rise. Potential contaminants present on brownfield sites within the target communities will be identified and delineated, and the most viable methods for remediation will be determined, thereby reducing or eliminating impacts to the target communities health and welfare. Companies that once avoided pursuing new business ventures within the target communities will invest in new infrastructure providing job opportunities during construction, increased long-term employment opportunities to target community residents, and increased tax revenue. As the seeds of redevelopment are sown, a new sense of civic pride will emerge whereby target community property owners have the financial means and desire to make improvements to their homes, businesses, and the community as a whole. The investigation and remediation of brownfield properties will reduce the impact that contaminants have on sensitive populations such as low income residents and the poor. After a site has been remediated, residents will no longer be at risk from direct exposure to impacted soils, vapor intrusion, and/or friable asbestos. This reduction in exposure will help to lower incidences of disorders of the liver, kidney, nervous system, respiratory system, hormonal system, enzyme system, immune system and blood, as well as birth complications – all of which are exacerbated by direct exposure to contaminants known or believed to be present on brownfield sites in Columbus. To maximize the health benefits afforded to the target communities' residents, the City may contact the Agency for Toxic Substances & Disease Registry (ATSDR) for technical assistance and resources to support public health assessments and other studies to prevent exposures and disease related to toxic substances.

V.B.4.a.ii. Environmental Benefits: Potential groundwater and soil impacted by hazardous substances and petroleum in the target community pose a threat to the ecological stability of local bodies of water, such as White River, Flat Rock River, Haw Creek, Clifty Creek, smaller lakes/tributaries, and groundwater. These are important recreational resources to the target

communities and City as a whole. By assessing brownfields adjacent to important natural bodies of water, potential contaminants can be identified and removed so that threats to water bodies from possible migration of contaminants is reduced or eliminated.

Measures will be taken to protect sensitive populations and ecological receptors in the target communities from contaminants during assessment work conducted at brownfield sites. Investigation derived waste will be drummed and removed from the site for disposal at a qualified disposal facility. During the investigation activities, an exclusion zone will be established to prevent the general public from entering areas where danger from exposure and/or construction activities is present. If fugitive dust becomes a concern, measures will be taken to reduce the risk and eliminate dust migration from the subject properties during investigation activities. Erosion control measures will be used to prevent erosion of contaminated soils unearthed during investigations and assure the soils are not carried from the subject site and onto adjoining public or private properties, or into waterways by surface water drainage. These activities and others outlined herewith align with the Livability and Equitable Development Principles by supporting existing communities through the protection of sensitive populations, enhancing economic competitiveness and valuing communities and neighborhoods.

V.B.4.b.i. Planning, Policies, and Other Tools: Many target areas consist of old commercial and industrial sites in the midst of an urban setting. Sustainable development principles including infilling neighborhoods, matching land uses to available infrastructure, and protecting natural resources and greenspace are a fundamental part of the City's already established Advance Columbus Strategic Plan. The City is prepared to invest in the target communities to re-use and modernize infrastructure supplying redeveloped brownfield sites with the necessary infrastructure and providing the sites with sustainable redevelopment potential. Opportunities exist to create modern eco-commercial/industrial and residential developments, particularly in the downtown area. Columbus has already made significant investments in brownfield redevelopment. The City recently funded environmental investigations for the Golden Castings site, although more is needed and at a greater cost than the city can invest. As a result of the City's investment, a new development is pending which will reduce blight, bring both temporary and permanent jobs to the area, and will significantly increase the tax base. The City has also used SRF funding managed by the Indiana Finance Authority to remediate a former creosote plant that was impacting soil and groundwater and recently redeveloped portions of the site into a pedestrian/cycling trail, a property on Pendleton Pike that was a former gas station and the adjoining former machine shop. As a result of this environmental investigation investment by the City, a significant development (apartment complex and retirement community) is planned which will reduce blight, bring both temporary and permanent jobs to the area (over 150 total), and increase the tax base. As outlined in the Advance Columbus Strategic Plan, the City established the Mayor's Environmental Coalition which implements programs and projects that advance environmental citizenship in the community. The Environmental Coalition successfully established a robust curbside recycling program, developed plans and protocols for sustainable waste management at community events, initiated water testing in local waterways, promoted the successful expansion of bus transit in the City, and is currently exploring upgrades to local building codes to meet LEED standards for all new construction. All of the planned infrastructure reuse described above will reduce greenhouse gasses and improve Columbus's impact on climate change. A partnership with the EPA and the City of Columbus through the award of this grant is a critical step toward future green infrastructure investment by both the public and private sectors.

V.B.4.b.ii. Integrating Equitable Development or Livability Principles: The City's goals outlined in the Advance Columbus Strategic Plan expected to be achieve through brownfield redevelopment are summarized below and include the following outputs/outcomes:

<u>Infill vacant lots downtown with retail and mixed use development</u>: Assessment and redevelopment of brownfields supports the improvement and creation of affordable housing and commercial/residential mixed use development. This will create more community vibrancy, stimulate economic growth, reduce urban sprawl, and improve employment and affordable housing opportunities for target community residents.

<u>Create a more walkable downtown & create bike and pedestrian paths and infrastructure</u>: Brownfield redevelopment will help the City reach their goal of further developing a network of walking and biking trails throughout the community and to help develop more recreational opportunities for residents and provide connectivity to residential and commercial development. Economic growth will be stimulated through linkage of residential areas to a revitalized downtown and its retailers, public transportation hubs, and other community amenities via new trails and greenspace. Improving environmental conditions of natural resources through park, trail, and greenspace redevelopment will increase property values, enhance alternative transportation options, encourage physical fitness of residents (reduce obesity and improve cardiovascular health), and create a

sustainable, green infrastructure for future generations.

<u>Develop Affordable Housing</u>: Assessment and redevelopment of brownfields support the improvement and construction of affordable housing, creating community vibrancy, stimulate economic growth, and reduce urban sprawl.

<u>Diversify State Street Corridor economy</u>: The assessment of sites in Table 2 will result in the redevelopment of facilities along State Street, with existing infrastructure in the community which will reduce urban sprawl in greenfields at the outskirts of the City. Redevelopment will leverage other incentives (e.g. tax abatements) which will help create jobs and improve quality of life for residents through increased wages, and create an appealing and welcoming thoroughfare through the City. Positive, sustainable end-uses after redevelopment will prevent pollution and reduce consumption. This urban redevelopment will help Columbus to realize the vision of bringing back the vibrant State Street corridor it once had.

Each of the outcomes listed above directly link Columbus's brownfield redevelopment goals to the HUD-DOT-EPA's goals to incorporate Livability Principles and Sustainable Communities ideologies. Specifically, these outcomes will ensure that Columbus's brownfields are cleaned up and reused in ways that contribute to greener and healthier homes, buildings, and neighborhoods; mitigate environmental conditions through effective strategies which address solid and hazardous waste, and improve air and water quality; improve residents' access to greenspace, recreational property, alternative transportation, improve employment and provide affordable housing opportunities for local residents; reduce toxicity, illegal dumping, and blighted vacant parcels; and retain residents who have historically lived within areas affected by brownfields.

V.B.4.c. Economic and Community Benefits (long term benefits):

V.B.4.c.i. Economic or Non-Economic Benefits: End-use redevelopment of brownfields will realize an expanded tax base for the City of Columbus. Through increased investment, jobs will be created, new residential units will be constructed and property values will be enhanced. According to the Northeast-Midwest Institute (2008), public investment plays a vital role in local economic benefits. Results of the study show that every \$1.00 of public funds invested leverages \$8.00 in total investment. In addition, the study concluded that for every one (1) acre of redeveloped brownfields used, 4.5 acres of greenfields are preserved, lowering the cost of development and infrastructure. A partnership between the City of Columbus and the EPA through this grant would allow the City to grow the local economy through such a return on investment. Tax revenues generated on properties adjoining and near redeveloped sites would be increased and new jobs would yield even more tax revenues. As brownfields are redeveloped, the "trickle down" seen in job, employment and revenue loss previously discussed (see V.B.1.b.i) through the loss of smaller, support facilities, restaurants, retailers and others, will be reversed and economic growth will multiply. The leveraging of these additional dollars will be made possible by the EPA Grant.

As a part of the redevelopment design, Columbus has a plan to add multi-use trails to improve the "walkability" in the City. Some trails are already complete, and plans are in place to develop more as brownfields are investigated and remediated (if needed). These trails will not only serve recreational purposes, but will be linked to the existing trail network where possible, facilitating pedestrian and bicycle traffic travel throughout the community. Other planned redevelopment in the community will include significant greenspace improvement.

V.B.4.c.ii. Job Creation Potential: Partnerships with Workforce Development Programs: When appropriate, Columbus will work with Ivy Tech Community College and their School of Applied Science & Engineering Technology located in nearby Indianapolis. The school is designed to prepare students for direct entry into the workforce, often in positions directly and/or indirectly related to brownfield redevelopment. This partnership will provide a direct link between trained environmental professionals and the community. As discussed in Section V.B.3.b., Columbus will work with WorkOne to develop opportunities for employers and job seekers to improve the region's workforce through job placement assistance in environmental investigation, remediation, and site redevelopment. Finally, the City will make every effort to enter into contracts with local contractors and service providers.

V.B.5. Programmatic Capability and Past Performance

V.B.5.a. Programmatic Capability: The City has designated Carl Malysz, Director of Economic Development as the Grant Project Manager. Mr. Malysz works closely with the City of Columbus and surrounding governmental and quasi-governmental organizations and has been involved in the coordination of brownfield redevelopment projects since he began working for the City in 2013. Mr. Malysz has been a practicing urban planner and community development strategic planner and implementer for over 30 years where he has been responsible for managing millions of dollars in grant funds. He holds a B.S. degree in Urban Planning from Michigan State University and an M.S. degree in Public Administration from the University of Louisville. Together, his education, experience and expertise make him a highly credentialed chose for Grant Project Manage. Under previous employment with the City of New Albany, Indiana, Mr. Malysz headed that city's

community development department which included successfully securing and the initial implementing of an EPA Brownfield Assessment Grant prior to his leaving his employment with New Albany. He has managed millions of dollars' worth of grants in his 30+ years of experience. His other leadership roles have required him to, among other things, manage grants of many millions of dollars. Mr. Malysz, supported by Columbus Redevelopment Director Heather Pope will work with the EPA, Indiana Brownfields program, and a qualified environmental consultant to ensure that grant funds will successfully expended in a timely fashion and will complete all technical, administrative, and financial requirements of the grant. Mr. Malysz and Ms. Pope have experience managing and overseeing assessment activities carried out by qualified environmental consultants and engineers and public outreach specialists. City leaders have the authority to negotiate access agreements and perform the follow-on steps of redevelopment plans, such as community and regional planning. City staff has a history of working cooperatively with state and federal environmental agency personnel and engaging qualified environmental consultants when appropriate. Columbus will retain consulting support in accordance with all applicable regulations in order to carry out contractual requirements under this grant. The selected consultant will be required to provide support to successfully and efficiently complete all grant tasks including but not limited to program management, public meeting facilitation, public outreach, brownfield inventory and prioritization, environmental investigation, coordination with government entities and community based organizations, cleanup planning, health monitoring, and the identification of funding needed to complete redevelopment. If Mr. Malysz is unable to complete the Project Management duties related to the grant, Ms. Heather Pope, Director of Redevelopment will assume the responsibilities of grant management. Ms. Pope also has extensive experience in the duties listed above.

V.B.5.b. Audit Findings: Columbus has an excellent record of managing federal grants. They have neither received an adverse audit for the use of federal grants nor has there been the need to comply with special "high risk" terms.

V.B.5.c. Past Performance and Accomplishments: Although the City has not received EPA Brownfields funding, they have received other federal and non-federal funded assistance agreements. Table 6 outlines a partial list of the assistance agreements used by City to develop and complete community-wide infrastructure projects.

Table 6 - Past Federally/Non-Federally Funded Assistance Agreements

	Project	\$ Funding Received	Outputs/Outcomes
Funding Source	Project	\$ runding Received	Culpus/Culcones
Indiana Dept. of Transportation	4 th Street reconstruction	1,504,943	Rebuild arterial street section, improved infrastructure
Incliana Dept. of Transportation	Indiana Ave rehabilitation	\$4,940,276	Reconstruct 1 mile section of street creating sidewalks, bike lanes, landscaping, improve traffic flow, create a more walkable community, increase resident health, reduce automobile emissions through reduction in idling
Community Development Block Grant	Home rehabilitation	\$262,500	Rehabilitation of 15 homes occupied by low-income residents, reduce energy consumption and costs, increase home values
Indiana Brownfield Program	Golden Castings env. investigation	\$75,000	Phase I and II ESAs, advance efforts to redevelop site
Indiana Office of Community and Rural Affairs	Golden Castings demolition	\$157,755	Clearance and demolition of building and debris on site in preparation for planned redevelopment

Columbus successfully managed all project agreements including meeting and complying with local, state and federal reporting requirements, terms and conditions, the submission of final acceptable technical reports, and progress reporting throughout the duration of these agreements. There were no adverse findings from the granting sources of these agreements, and each project was successfully managed.

V.C. Other Factors: The City of Columbus meets several criteria listed in the Other Factors Checklist. See the checklist attached to the cover letter and included in Attachment VI.

Appendix 3 Assessment Other Factors Checklist

Name of Applicant:	CITY OF COLUMBUS, INDIANA	
1 1		

Please identify (with an \mathcal{X}) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	Page #
	Community population is 10,000 or less.	
	Federally recognized Indian tribe.	
	United States territory.	
	Applicant will assist a Tribe or territory.	
	Targeted brownfield sites are impacted by mine-scarred land.	
	Targeted brownfield sites are contaminated with controlled substances.	
Х	Recent natural disaster(s) (2006 or later) occurred within community, causing significant community economic and environmental distress.	5
Х	Project is primarily focusing on Phase II assessments.	7, 8
	Applicant demonstrates firm leveraging commitments for facilitating brownfield	
X	project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	8-10
	Community experienced manufacturing plant/power plant closure(s) (2008 or	
	later) tied to the targeted brownfield sites or project area, including communities	
	experiencing auto plant/power plant closures due to bankruptcy or economic	
	disruptions.	-
	Recent (2008 or later) significant economic disruption (<u>unrelated</u> to a natural	
	disaster or manufacturing/auto plant/power plant closure) has occurred within	
	community, resulting in a significant percentage loss of community jobs and tax base.	
	Applicant is one of the 12 recipients, or a core partner/implementation strategy	
	party, of a "manufacturing community" designation provided by the Economic	
	Development Administration (EDA) under the Investing in Manufacturing	
	Communities Partnership (IMCP). To be considered, applicants must clearly	
	demonstrate in the proposal the nexus between their IMCP designation and	
	the Brownfield activities. Additionally, applicants must attach	
	documentation which demonstrate either designation as one of the 12	
	recipients, or relevant pages from a recipient's IMCP proposal which	
	lists/describes the core partners and implementation strategy parties. A core	
	partner/implementation strategy party is a local partner organization/jurisdiction	
	that will carry out the proposed strategy, as demonstrated in letters of	
	commitment or memoranda of understanding which documents their	
	contributions, roles, and responsibilities to the partnership. EDA may provide to	

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ATTACHMENTS

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- II) State Acknowledgement Letter
- III) City Resolution Letter
- IV) Letters of Support from Partners, Health Department, & WorkOne
- V) Firm Leveraging Commitments
- VI) Other Factors Checklist (also attached to Cover Letter)

ATTACHMENT I)

Threshold Documentation

III.C. Threshold Criteria for Assessment Grants

III.C.1 Applicant Eligibility

The City of Columbus, Indiana is a General Purpose Unit of Government as defined under 40 CFR Part 31 and is a political subdivision of the State of Indiana. It is therefore eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.

III.C.2 Letter from the State Environmental Authority

A letter of acknowledgment from the Indiana Department of Environmental Management (IDEM) is included with this application (see Attachment II)

III.C.3 Community Involvement

Involving our community and soliciting feedback regarding Brownfields activities and redevelopment plans are essential to our community's Brownfields program's success. Communication is a two-way process, our ultimate goal is to keep the community informed and involved so they remain aware of potential concerns, questions and solutions. Columbus will utilize social media platforms, earned media and other low-cost, no-cost or in-kind methods to engage the community, solicit public and stakeholder participation, and advertise public meetings. Regular public meetings have already been and will continue to be held to engage the public and encourage stakeholder and residents' participation in the EPA grant funded Brownfield activities. See section V.B.3 in Ranking Criteria for further information.

III.C.4 Site Eligibility and Property Ownership Eligibility

This criterion is not applicable for a Community-Wide Brownfields Assessment Grant application.

ATTACHMENT II)

State Acknowledgement Letter



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence Governor

Thomas W. Easterly Commissioner

December 19, 2014

The Honorable Kristen S. Brown, Mayor City of Columbus City Hall, 123 Washington Street Columbus, Indiana 47201

> Re: U.S. EPA Brownfields Grant Proposal

> > **IDEM Acknowledgement Letter** Community-wide Assessment

Hazardous Substances and Petroleum

City of Columbus

Bartholomew County, Indiana

Dear Mayor Brown:

This letter is provided in support of the City of Columbus' (City) proposal to the U.S. Environmental Protection Agency (U.S. EPA) for Brownfields Community-wide Assessment Grant funding. The Indiana Department of Environmental Management (IDEM) acknowledges that the City is applying for \$400,000 (\$200,000 for hazardous substances and \$200,000 for petroleum) to continue the City's brownfield program and focus on brownfield sites primarily located in the central portion of the City (known as "Big Block") and the State Street corridor, in addition to other priority brownfields with high redevelopment value based on its previous inventory efforts.

IDEM believes that the City of Columbus has demonstrated its commitment to redeveloping brownfields by taking advantage of financial and technical assistance offered by the Indiana Brownfields Program in the past (e.g., Golden Castings site, Former Columbus Wood Treating Plant). This assessment grant funding will help the City continue its effort to address brownfields in the community. Should an opportunity arise for the City to need/pursue liability or cleanup assistance at any of the sites investigated with this grant funding, the City will explore participating in the Indiana Brownfields Program or the IDEM Voluntary Remediation Program.

Based on the information submitted, IDEM considers the City of Columbus an excellent candidate to receive U.S. EPA grant funding to continue its brownfield



U.S. EPA Brownfields Grant Proposal IDEM Acknowledgement Letter December 19, 2014 Page 2 of 2

redevelopment efforts, which support Indiana's brownfield initiative. IDEM is pleased to assist and looks forward to continuing its partnership with the City of Columbus. For further assistance, please contact Michele Oertel of the Indiana Brownfields Program toll free at (800) 451-6027, ext. 4-0235, or directly at (317) 234-0235 or at moertel@ifa.in.gov.

Sincerely,

Bruce A. Oertel, Chief Remediation Services Branch Office of Land Quality

BAO/mmo

cc: (via electronic transmission)

Carl E. Malysz, Community Development Director Joel Markland, Bruce Carter Associates, LLC

Michael Nolting, Neighborhood and Community Development Consultant

ATTACHMENT III)

City Resolution Letter

RESOLUTION NO. 6, 2014

A RESOLUTION OF THE BOARD OF PUBLIC WORKS AND SAFETY OF THE CITY OF COLUMBUS, INDIANA, TO ENDORSE THE SUBMISSION OF THE APPLICATION FOR EPA BROWNFIELD ASSESSMENT GRANT FUNDING

WHEREAS, the City of Columbus has determined that it should be proactive in the restoration of environmentally impaired sites to productive and beneficial use; and

WHEREAS, the U.S. Environmental Protection Agency (EPA) provides grants to communities for the assessment of environmentally contaminated properties; and

WHEREAS, it has been determined that a unified administrative/legislative effort would be advantageous to the City of Columbus when applying for a Brownfield Assessment Grant; and

WHEREAS, the grant applicant will consist of the City of Columbus, IN who will serve as the grant recipient and administrator; and

WHEREAS, the City of Columbus Strategic Plan, entitled *Advance Columbus*, contains defined goals and priorities to become an environmentally responsible and sustainable community; and

WHEREAS, activities, programs and projects are identified and implemented each year to attain environmental sustainability throughout the community; and

WHEREAS, securing environmental assessment grant funding from the EPA is a programmatic objective of Advance Columbus during calendar years 2014-2015;

NOW, THEREFORE, BE IT RESOLVED, by the Board of Public Works and Safety of the City of Columbus, Indiana as follows:

Section 1. The City of Columbus, Indiana supports the application to the EPA for the EPA Brownfield Assessment Grant to fund environmental assessment costs at various brownfield sites in the City of Columbus.

Section 2. This resolution shall be in full force and effect from and after its adoption by the Board of Public Works and Safety, approval by the Mayor, and publication as required by law.

RESOLUTION NO. 6, 2014

ADOPTED BY THE BOARD OF PUBLIC WORKS AND SAFETY OF THE CITY OF COLUMBUS, INDIANA.

BOARD OF PUBLIC WORKS AND SAFETY	DATE: 12-16-14
- Crows Ba	•
Kristen S. Brown, Mayor	
Robert A. Crider, Member	
Layne Farber, Member	
Robert Sullivan, Member	
Call	
Caleb Tennis, Member	Luan Welmer
	Luann Welmer, Clerk-Treasurer

ATTACHMENT IV) Letters of Support from Partners

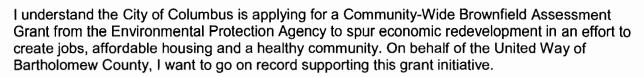
December 15, 2014

Mayor Kristen Brown Columbus City Hall 123 Washington St. Columbus, IN 47201

Dear Mayor Brown:

RE: Support for the EPA Brownfield Assessment Grant

Dear Mayor Brown,



United Way

Columbus, IN 47201 Phone (812) 376-3001

Fax (812) 376-0019 info@uwbarthco.org

of Bartholomew County, Inc.

1531 Thirteenth St., Suite 1100

As you know, the United Way of Bartholomew County exists to advance the common good by creating opportunities for a better life for all of our citizens. Our focus is on education, financial stability and health, because these are the building blocks for a good quality of life. The spirit of the grant is aligned with the mission of the United Way of Bartholomew County which is to encourage and lead the people of our community to care for each other and share resources in order to meet human needs and to create lasting changes.

Many of the neighborhoods in our community have brownfield sites, it is our widely held belief that these properties hamper redevelopment effort, create long-term safety and environmental hazards, and lowers property values, all of which are counter to our mission.

United Way of Bartholomew County strongly agrees with the Brownfield Assessment Grant effort initiated by the City of Columbus and stand ready to support the redevelopment of our community. We have a passion to help our community succeed and agree to offer our considerable experience, resources and neighborhood influence through participation and facilitation of public input opportunities. We will also provide support and expertise in helping identify priority sites to be added to the brownfield inventory. In addition, as part of the United Way of Bartholomew County's deeper commitment, we will afford qualified Targeted Community residents to participate in "Bartholomew County Works!" which is a comprehensive job opportunity, employment training and life skills coaching program recently launched.

We look forward to working with you on this project and are excited to see the economic benefits it will bring to our City.

Respectfully,

Mark Stewart President

GIVE. ADVOCATE. VOLUNTEER. LIVE UNITED...



December 11, 2014

Mayor Kristen Brown Columbus City Hall 123 Washington St. Columbus, IN 47201

Re: Support for Brownfield Site Assessment Grant Funding

Dear Mayor Brown:

I am pleased to support the City's application for the Brownfield Site Assessment Grant administered by the Environmental Protection Agency (EPA). Identifying and redeveloping brownfield properties is a key component of the City's strategic initiative toward building a better community for some of Columbus' most at-risk citizens--the very citizens that my organization serves every day.

Thrive Alliance (TA) is a non-profit organization that serves seniors, people of all ages with disabilities, and low-income families. We provide information and referral, care planning and management, and direct services for our clients whose needs include in home care, nursing home placement assessment, caregiver support, transportation, nutrition programs, legal services, early intervention services for children with developmental delays, home repairs, affordable housing, volunteer opportunities, and many other community services of federal and state programs (Medicare, Medicaid Waiver, HOME, and CHOICE, for example).

The Brownfield Site Assessment Grant, if awarded, would provide funding to test sites for hazardous substances and petroleum contamination. This funding would aid tremendously in the redevelopment of sites often overlooked because of unknown development costs. Our historic downtown neighborhood contains a significant brownfield property, and the entire neighborhood would benefit greatly from redevelopment that might be catalyzed by this grant. TA has made significant investments in the housing stock of this neighborhood over time, including leadbased paint remediation. Redevelopment of this site is just one example of how the grant would have a huge local impact on struggling neighborhoods throughout our community.

Furthermore, Thrive Alliance views this grant as a first step in identifying sites throughout the community which have the potential to attract redevelopment by companies that specialize in building affordable housing for low-to-moderate income families. We serve many families in this demographic profile, and strongly agree with the City's pursuit of the EPA's Brownfield Assessment Grant. Thanks to previous testing on part of the property, the downtown brownfield site mentioned above already has a planned redevelopment in place--a nursing home and an affordable multifamily housing complex, both of which will serve the needs of families and seniors seeking affordable housing and eldercare.

In an effort to assist with this brownfield redevelopment effort, we will gladly work with the city to develop a brownfield inventory with the hopes that more sites can be identified, investigated, remediated, and redeveloped to serve the families in need of affordable housing and an improved economic well-being. We will also work with the City to disseminate information about the grant progress, including opportunities for citizens to have their voices heard through organized stakeholder input opportunities. We will share this information through our website, daily contact with residents, and other means.

As Executive Director of Thrive Alliance, I strongly support the City's efforts to secure this grant and improve our community. Let me know if you have any questions about our work, and please keep us informed about your progress.

Sincerely,

Mark Lindenlaub

Marke lindenland

Executive Director



December 10, 2014

Mayor Kristen Brown Columbus City Hall 123 Washington St. Columbus, IN 47201

Dear Mayor Brown,

The Lincoln-Central Neighborhood Family Center is in support of the City of Columbus' application for an EPA Community-wide Brownfields Assessment Grant. The LCNFC is a full-service resource center for children, youth and adults residing in the Lincoln-Central Neighborhood, Census Tract 101 in downtown Columbus. The target community the City is seeking to address is located in the middle of our neighborhood. Clearly, this project directly impacts our constituents and is of utmost importance to the success we are striving to build in our neighborhood.

Addressing brownfields in this area will encourage infill development and make investment in these challenging properties much easier. The City adopted a comprehensive neighborhood revitalization plan that the LCNFC supported and empowered neighborhood residents to develop. This project will complement the plan as we work together to make the area a "neighborhood of choice." Aligning this work will help the area address affordable housing, create jobs and clean-up blighted areas – leading to a safer and healthier community.

In the spirit of partnership and commitment to this process, LCNFC will assist the City by organizing neighborhood meetings and assist with public outreach. Additionally, we will assist in the circulation of information about public meetings and the grant process.

The LCNFC provides approximately 30 programs and services, free of charge, to its neighbors in seven priority areas – safety, infrastructure, health, education, positive youth development, parent-child interaction and parent support. We are ever mindful of how brownfields impact those we serve, and we are pleased to see the commitment Columbus is making to address these challenging properties in our community.

Sincerely,

Randy Allman Executive Director

LCNFC





December 14, 2014

Mayor Kristen Brown Columbus City Hall 123 Washington St. Columbus, IN 47201

Dear Mayor Brown:

RE: City of Columbus EPA Grant Application for Brownfield Properties

Dear Mayor Brown,

I am writing as President and CEO of Heritage Fund the Community Foundation of Bartholomew County to support the City's effort to address the needed funding for the assessment contaminated sites in our community. As you are aware, Heritage Fund is focused on improving the quality of life in Bartholomew County by focusing on education, economic growth, welcoming community and bridging the economic gap.

The City of Columbus has made progress in recent years to build and program the sort of community that attracts talented individuals to fill the job openings that keep our economy growing. As a community foundation we strive to encourage and support initiatives that will continue to make this community the kind of place in which people want to live and work. We also work to ensure that a positive quality of life is available to all people in our community.

We support the City's interest in addressing the contaminated sites that exist. Some of those sites are barriers to economic development projects and others are threats to neighborhoods. Being able to address one or more contaminated sites would enable a variety of initiatives to move forward and create vibrant, usable spaces to contribute to the economic vitality of certain neighborhoods or the downtown, which is everyone's neighborhood.

We will support this project/organization using the resources of the community foundation as appropriate.

We hope that this application will receive a favorable review from the EPA and we look forward to working in partnership with the City and others to address the contaminated barriers to our growth, prosperity and economic wellbeing.

Board of Directors

Kevina A. Schumaker

Chair

Mickey Kim

Vice Chair

Jesse Brand

Secretary

Tom O. Vujovich

Treasurer

Tracy H. Souza

President & CEO

David S. Barker

Kelly S. Benjamin

James D. Bickel

Kristen S. Brown

John M. Burnett

Jarvis Cooper

Diane A. Doup

Mark S. Elwood

Rich Freeland

Tony M. Gambaiani

Thomas D. Harmon

Ryan C. Hou

Laura Hurt

Carl H. Lienhoop

Joseph Mathew

Angie May

Nobu Nakajima

John B. Quick

Brian P. Russell

Mark Stewart

Patrick Ward

Ro Whittington

Tracy Hamilton Souza
President and CEO

Sincerely.





December 14, 2014

Mayor Kristen Brown Columbus City Hall 123 Washington St. Columbus, IN 47201

Dear Mayor Brown:

RE: City of Columbus EPA Grant Application for Brownfield Assessment

Dear Mayor Brown,

The Eastside Community Center (ECC) is in support of the City of Columbus' application for an EPA Community-wide Brownfields Assessment Grant. The ECC is a full-service resource center for children, youth and adults residing in the Eastside Neighborhood of Columbus, Census Tract 108, which includes the State Street corridor which is an area targeted for redevelopment and reinvestment. This target area, which the City is seeking to address, runs through the middle of the Eastside Neighborhood. Clearly, this project directly impacts our constituents and is of utmost importance to the success we are striving to build in our neighborhood.

Addressing brownfields in this area will encourage infill development and make investment along this challenged business corridor much easier. The City adopted the *State Street Corridor Plan* as an element of the City's Comprehensive Plan, and the EEC will support and empower neighborhood residents to engage in the implementation process. If approved the EPA Grant environmental assessment grant will complement efforts as we work together to make the area a "neighborhood of choice." Aligning this work will help the area address affordable housing, create jobs and clean-up blighted areas – leading to a safer and healthier community.

In the spirit of partnership and commitment to this process, ECC will assist the City by organizing neighborhood meetings and providing grass root public outreach. Secondly, we will actively hold committee positions and/or board memberships and help circulate information about public meetings and the grant process via our website and other means.

The ECC provides several programs and services, free of charge, to its neighbor members. We are ever mindful of how brownfields impact those we serve, and we are pleased to see the commitment Columbus is making to address these challenging properties in our community.

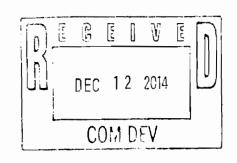
Sincerely,

Pricilla Scalf

Executive Director

December 11, 2014

Mayor Kristen Brown Columbus City Hall 123 Washington St. Columbus, IN 47201





RE: EPA Grant Application for Brownfield Sites- City of Columbus, Indiana

Dear Mayor Brown:

The Columbus Area Chamber of Commerce represents 600-member businesses that employ more than 29,000 people. Our mission is to drive economic growth by fostering an innovative business environment and a world-class community. This letter is our means of supporting the City's request for the funding required for the investigation of contaminated sites in the core of our community.

Federal assistance to address the City's brownfield sites will help economically revitalize those areas where we would otherwise continue to see a lack of interest from private investment due to the unknown cost of environmental work. The blighted area is centrally-located and surrounded by historic homes that add to the character of the community. This is all the more reason for the City to pursue any and all means to secure funding that will help preserve our history and create growth and opportunity for the next generation of citizens in the City.

The Chamber continues to help launch new businesses and grow existing businesses in Columbus. There have been many new businesses open in our community in the last 12 months as the economy slowly improves. To continue this forward-momentum, we need to address our community's most challenging development opportunities.

The Chamber understands that the State Street corridor has been targeted for use of EPA environmental assessment funding. The Chamber was actively involved in the preparation of the State Street Corridor Plan which is now an element of the City's Comprehensive Plan. The Chamber will help to market the EPA environmental assessment grant program to property owners and businesses interested in making new investments in real property along the corridor.

Finally, the Columbus Area Chamber of Commerce will assist the City by providing the support needed to preserve historic properties impacted by environmental contamination. Secondly, we will provide outreach services which will include providing space for public meetings and disseminating information about public meetings and the grant process via our website and other forms of media.

Should you have any further questions pertaining to this matter, please feel free to contact me.

Respectfully,

Cindy Fre∜ President

Columbus Area Chamber of Commerce



December 11, 2014

Mayor Kristen Brown Columbus City Hall 123 Washington St. Columbus, IN 47201

Dear Mayor Brown:

I am writing in support of the city of Columbus' application for the EPA Brownfields Assessment Grant. This is extremely valuable to our city for numerous reasons, and of particular interest to the Columbus Area Metropolitan Planning Organization's (CAMPO) mission.

The CAMPO is involved in transportation planning, the distribution of federal funds for transportation projects, and the environmental justice issues of fair distribution of funds and good job access for all community members through good transportation options.

Many of these brownfield locations are in very central locations in the city, which could provide locations for living, working, shopping, and playing. Assessing these, getting them cleaned up and usable in locations where the infrastructure already exists, where transit already exists, and where jobs and shopping are all within walking distance, is exactly what we need.

Columbus has been an industrial city from the beginning, and we are lucky that many of our active industrial sites today are in the city and within walking distance and served by transit. However, there are many abandoned sites that are now very centrally located that would be perfect for affordable housing, for example, where the residents would not need a car. Meanwhile, because these locations are likely to be polluted, they sit empty while developers build both housing and new commercial sites in greenfields where transit does not currently serve, where costly infrastructure is necessary, and where a car is a virtual necessity to get there. Making these in-fill locations usable would save us millions of dollars in infrastructure, contribute immensely to the job access, reduce sprawl, create more affordable housing, reduce driving, increasing walking and transit use, reduce pollution, and improve health.

CAMPO supports and will participate throughout this process with regard to cleaning up these brownfields for future use. We will provide our expertise regarding reuse planning and help city officials develop a strategy that maximizes investment on sites planned for redevelopment. In addition, CAMPO will help inform stakeholders about upcoming public meetings and will participate in the meetings, helping facilitate and serve as an advisor for redevelopment. Finally we will provide meeting space, if needed, for these public events.

We look forward to opportunities to serve in this capacity, and are excited about the changes this opportunity will bring to our community.

Sincerely,

Laurence Brown CAMPO Director

Laure C Bean



Southeast Indiana Workforce Investment Board

4555 Central Avenue, Suite 1300 Columbus, IN 47203-1892 Phone, N12-314-8568

• December 18, 2016

Mayor Kristen Brown Columbus City Hall 123 Washington St. Columbus, IN 47201

Dear Mayor Brown:

Our region's WorkOne offices support the City of Columbus's efforts for brownfield redevelopment and supports the City's efforts in applying for a Community-wide Assessment Grant from the US EPA.

WorkOne has numerous partners in the community that work with individuals seeking employment and business seeking employees. Our staff helps direct job seekers and business to the right resources, making the process of seeking a job or finding new employees less daunting. We help those seeking employment develop a career plan to ensure their continued success. WorkOne is a key source for information, job referrals, placement assistance, and other services. For businesses seeking employees, WorkOne offers cost-effective and convenient access to thousands of job seekers.

With brownfield revitalization, there will be additional opportunities to decrease the unemployment in the areas that are most affected by brownfields. It is important to reverse the trend of unemployment and poverty and to work with the individuals most affected by the brownfields.

We would be pleased to serve as a partner with the city of Columbus to facilitate job training and job placement tied to the redevelopment of brownfields in the city. We can also provide support by reaching out to community members through our website or through newsletters. We are glad to lend our support look forward to being a part of this successful effort.

Southeast Indiana Workforce Investment Board

Kurt Kegerreis, Director

Southeast Indiana Workforce Investment Board

[&]quot;"This WIA Title I-funded program/activity is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities."



Bartholomew County Health Department

Environmental Health/Vital Records

440 Third Street, Suite 303 • Columbus, .N 47291-6798 Phone: (612) 379-1050 Fax: (812) 379-1040

December 15, 2014

Mayor Kristen Brown Columbus City Hall 123 Washington St. Columbus, IN 47201

Dear Mayor Brown:

The Bartholomew County Health Department is pleased to express its support for the City's pursuit of the US EPA brownfields assessment grant.

The Bartholomew County Health Department is dedicated to the health of the residents in Columbus and Bartholomew County. We are proud to become a partner in the City's initiative to address brownfields. Potentially contaminated properties and old industrial sites are primarily located in Columbus's low-income residential areas. These are the areas that are disproportionately affected by environmental issues and these populations are often the beneficiaries of our health services.

It is the hope of the Health Department that the brownfields program will revitalize those properties that need it the most to create measurable improvement in the health of those residents living near the brownfields. The goals of the Health Department and the City of Columbus are the same: to improve environmental health for the residents and reduce the risks to public health and the environment. We will provide assistance by tracking the aid given to those residents in affected brownfields areas. We will also provide blood lead testing in low income, disadvantaged youth of the City and will provide educational/counseling services to residents who are found to have elevated levels to maximize the likelihood of reducing the lead in those impacted. This testing and educational/counseling service is estimated to be an in-kind investment of \$7,000 throughout the grant cycle. Finally, we will send information to residents should any health concerns be discovered as a result of the brownfield investigations.

We look forward to continuing our partnership with the City and strongly support their application for this grant.

Sincerely,

Collis G. Mayfield, R.E.H.

Director

ATTACHMENT V)

Firm Leveraging Commitments



Community Development

December 18, 2014

Environmental Management Support, Inc. Attn: Mrs. Edie Findeis Cromwell 8601 Georgia Avenue, Suite 500 Silver Spring, MD 20910

RE: City of Columbus, Indiana

EPA Brownfield Assessment Grant Application

Applicant Financial Leverage/Match

Dear Mrs. Cromwell:

The City of Columbus is resolute in its efforts to address brownfields in our community. The receipt of United States Environmental Protection Agency (EPA) Brownfields Assessment Grant is a critical tool to accelerate plans to redevelop the areas of greatest need. City leadership believes that EPA grant funding will be an extraordinary benefit to Columbus and the entire Columbus, Indiana MSA. As such, I am outlining the financial support the City can bring to the redevelopment table.

As a part of the grant application, the City understands that it must leverage additional funds/resources to support this grant request. The options currently available to the City include the following:

- 1. The City of Columbus receives and administers a small but highly effective Community Development Block Grant (CDBG) Program with funding of approximately \$250,000 each Federal Fiscal Year. The City recently updated a new 5-Year Consolidated Plan for the period FY2014-2018. This Plan includes focusing annual CDBG Program resources to eliminate slums and blight including those incumbent at the City's brownfield sites. Upon award of an EPA Brownfield Assessment Grant, the City will program \$50,000 for match for the Brownfield Assessment Program through FY 2015 funding. Also, on a project by project basis, the CDBG Program can be utilized to implement public infrastructure improvements in selected lower-income areas which quite often host the City's brownfield sites.
- 2. The City of Columbus operates a Small Business Revolving Loan Program funded through the U.S. Department of Agriculture. The Revolving Loan Program corpus available for lending at this time amounts to \$110,000. This program and funding are being repackaged for specific use along the State Street corridor which contains several high priority brownfield sites. The brownfield

sites located along the State Street corridor are typically smaller sites of one acre in size or less and that contain buildings or other improvements of 10,000 square feet or less. These Small business loans with be limited to \$20,000 per project.

- 3. The City of Columbus implements several Tax Increment Financing (TIF) districts, including one that encompasses the area of our community most heavily targeted for EPA grant funding investment. TIF funding can be used for infrastructure improvements projects surrounding these sites. Infrastructure projects may include new sidewalks, water lines, sanitary sewer upgrades, roads, et cetera. The TIF program would support redevelopment activities in the target community by providing funding for these infrastructure improvements. In addition, as individual cases and opportunities warrant, the City may use TIF funds as match for brownfield remediation efforts. Such match would be considered a case-by-case, project-by-project basis.
- 4. The City of Columbus routinely provides property tax abatements to redevelopment projects that result in private sector financial investments and job creation. Recently, property tax abatements have been granted for a brownfield redevelopment project worth \$10,800,000 in investment for 60 units of affordable rental housing and \$20,000,000 of investment in a former industrial plant being demolished and redeveloped for a 120,000 square foot retain business. Similar tax abatement requests that result in brownfield redevelopment are expected to continue and compliment the projects resulting from the EPA Brownfield Assessment Grant Program.

Because the value of the financial incentive depends on the scope of the redevelopment, the qualifications of the developer, and the regulatory and procedural due diligence that may apply, the City cannot commit an exact amounts of leveraged funds at this time. However, at this time the City is willing to pledge \$400,000 in leverage/match and in aggregate from the four programs listed above and which is equal to the amount of funding sought through this grant application.

The City of Columbus looks forward to an award of EPA Brownfield Assessment Grant funding opportunity and using TIF funding to support the redevelopment of brownfields in our community.

Sincerely

Call E. MaTysz

Community Development Director

Gateway Apartments L.P.

7160 Chagrin Road, Suite 250 • Chagrin Falls, OH 44022 • (440) 247-3900

December 15, 2014

Mr. Carl Malysz
Community Development Director
City of Columbus
City Hall
123 Washington Street
Columbus, IN 47201

Re: Gateway Apartments - Columbus Indiana

Dear Carl:

Pursuant to your recent request, please allow this correspondence to serve as a brief confirmation that commencement of construction of Gateway Apartments will be on or before March 2, 2015. The total investment comprising the Gateway Apartments development is approximately \$10,800,000.

Please do not hesitate to contact the undersigned with any question in connection with this brief project update.

Very Truly Yours,

JONESBORO INVESTMENTS CORP.

Timothy M. Morgan

Tim Moogan

General Partner



Bruce Carter Associates, LLC 6330 E 75th Street Suite 150 Indianapolis IN 46250

RE: Assisted Living Project in Columbus, IN

Joel,

Just so you have it for your files, the project we are working on in Columbus has a total project cost of about \$12,800,000. This would include purchasing the land, construction the building, doing the site work, and all the soft costs that go along with development projects.

In addition to the development/construction costs, this project will also generate additional jobs for the local community. Obviously during construction, there will be in excess of 100 different workers on the job. But once complete, this facility will have 56 employees with a total payroll in excess of \$1,000,000 annually.

As you can see, this project will have a decent economic impact on the community of Columbus.

Sincerely,

Rob Tolle

Mizak Development, LLC

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Historic Comprehensive General Liability ("CGL" a.k.a. "slip & fall") policies for the purpose of paying for third party property damage as a result of environmental issues, is a means of funding for sites in Indiana, large and small. This is particularly true when you combine this "hidden asset" with EPA Brownfield's Assessment grants so that development does occur.

Restorical Research's ("RR's") unique approach is to help its clients obtain funds to deal with environmental issues by finding the above mentioned policies or evidence that they existed. Indiana courts have consistently ruled that CGL policies may afford coverage to respond to action brought by the Indiana Department of Environmental Management (IDEM) or local governments calling for the investigation and cleanup of polluted properties. Most policies, and even some issued in the last few years, fall into this category where insurance funding may be available. In most situations, the property damage limits under these policies far exceed the cost of clean-up. Nevertheless, the more policies the better and finding the primarily, secondary or tertiary evidence of CGL policies that supports claims is a skill and expertise that has evolved over 15 years. RR has performed its craft for over 300 projects, most of which are in Indiana, in 14 states.

The Senior Citizens Center in Greensburg provides a perfect illustration of RR's unique approach of working with a community and its consultant and how third-party funds can be used to leverage more dollars toward an overall assessment and redevelopment program.

The City of Greensburg received an assessment grant of \$30,000 for a Phase I and limited Phase II assessment of their vacant Senior Citizens Center, a property which had once been a service station. RR was hired to investigate the possibility of using the City's historic insurance policies to fund the cleanup of any contamination found on the property during this assessment. The Phase II confirmed the site had soil and groundwater impact and at least six underground storage tanks were also discovered.

A RR archaeologist reconstructed the City's historic general liability coverage and coverage counsel successfully negotiated with the carriers. As a result, this project was completely funded by the insurance carriers. The site was remediated —<u>at no cost to the City</u>. In addition, the property was sold and Mayor Frank Manus, at the time was very pleased that the once-abandoned site was sold at fair market value and redeveloped.

12730 Meetinghouse Road, Suite 200 Carmel, Indiana 46032



"Our City was saved nearly \$500,000 in remediation costs and we won't have to lower our selling price because of environmental concerns.

What we once considered a liability has now become a very marketable asset."

- Mayor Frank Manus

This is an example of how a city utilized insurance recovery, in conjunction with a limited grant, to cleanup a site. (In this case \$30,000 leveraged \$500,000).

If you have any questions or would like additional information, feel free to contact me at your convenience.

Thank You.

David Valinetz, President CEO

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Restorical Research, LLC.

Appendix 3 Assessment Other Factors Checklist

Name of Applicant:	CITY OF COLUMBUS, INDIANA

Please identify (with an \mathcal{X}) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	Page #
	Community population is 10,000 or less.	
	Federally recognized Indian tribe.	
	United States territory.	
	Applicant will assist a Tribe or territory.	
	Targeted brownfield sites are impacted by mine-scarred land.	
	Targeted brownfield sites are contaminated with controlled substances.	
Х	Recent natural disaster(s) (2006 or later) occurred within community, causing	5
^_	significant community economic and environmental distress.	3
Χ	Project is primarily focusing on Phase II assessments.	7, 8
	Applicant demonstrates firm leveraging commitments for facilitating brownfield	
Χ	project completion by identifying amounts and contributors of funding in the	8-10
	proposal and have included documentation.	
	Community experienced manufacturing plant/power plant closure(s) (2008 or	
	later) tied to the targeted brownfield sites or project area, including communities	
	experiencing auto plant/power plant closures due to bankruptcy or economic	
	disruptions.	
	Recent (2008 or later) significant economic disruption (unrelated to a natural	
	disaster or manufacturing/auto plant/power plant closure) has occurred within	
	community, resulting in a significant percentage loss of community jobs and tax	
	base.	
	Applicant is one of the 12 recipients, or a core partner/implementation strategy	
	party, of a "manufacturing community" designation provided by the Economic	
	Development Administration (EDA) under the Investing in Manufacturing	
	Communities Partnership (IMCP). To be considered, applicants must clearly	
	demonstrate in the proposal the nexus between their IMCP designation and	
	the Brownfield activities. Additionally, applicants must attach	
	documentation which demonstrate either designation as one of the 12	
	recipients, or relevant pages from a recipient's IMCP proposal which	
	lists/describes the core partners and implementation strategy parties. A core	
	partner/implementation strategy party is a local partner organization/jurisdiction	
	that will carry out the proposed strategy, as demonstrated in letters of	
	commitment or memoranda of understanding which documents their	
	contributions, roles, and responsibilities to the partnership. EDA may provide to	

EPA a list of the core partners/implementation strategy parties for each of the 12 "manufacturing community" designees, which EPA would use to verify this other factor. Applicant will serve an area designated as a federal, state, or local Empowerment Zone or Renewal Community. To be considered, applicant must attach documentation which demonstrates this current designation. Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that
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directly tied to the proposed Brownfields project, and can demonstrate that
funding from a PSC grant/technical assistance has or will benefit the project
area. Examples of PSC grant or technical assistance include a HUD Regional
Planning or Challenge grant, DOT Transportation Investment Generating
Economic Recovery (TIGER), or EPA Smart Growth Implementation or
Building Blocks Assistance, etc. To be considered, applicant must attach
documentation.
Applicant is a HUD Promise Zone community. To be considered, applicant
must attach documentation.
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.